

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	Case No. 04-CV-8807 (KMK)
IN RE JAKKS PACIFIC, INC.	:	
SHAREHOLDERS CLASS ACTION	:	
LITIGATION	:	
_____	X	

NOTICE OF MOTION FOR APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that class member Indiana Electrical Workers Pension Trust Fund IBEW (“Indiana Electrical Workers”), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing Indiana Electrical Workers as Lead Plaintiff; (ii) approving Indiana Electrical Workers’ selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Indiana Electrical Workers submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated February 1, 2005.

DATED: February 1, 2005

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN (SR-7957)
DAVID A. ROSENFELD (DR-7564)
MARIO ALBA JR. (MA-7240)

/s/ Mario Alba Jr.
MARIO ALBA JR.

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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba, Jr., hereby certify that on February 1, 2005, I caused a true and correct copy of the attached:

Notice Of Motion For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Declaration Of Mario Alba Jr. In Support Of The Motion Of Indiana Electrical Workers For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Memorandum In Support Of The Motion Of Indiana Electrical Workers For Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel.

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba, Jr.

JAKKS PACIFIC

Service List - 1/14/2005 (04-0446)

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JAKKS PACIFIC

Service List - 1/14/2005 (04-0446)

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[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF
AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the motion of Indiana Electrical Workers Pension Trust Fund IBEW (“Indiana Electrical Workers”) for Appointment As Lead Plaintiff And Approval Of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefor:

1. Indiana Electrical Workers is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
2. The law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

SO ORDERED THIS ____ day of _____, 2005.

U.S. District Judge